BENCHMARK BANKSHARES, INC

JUN 2 8 2005

Parent Corporation of



100 South Broad Street Post Office Box 569 Kenbridge, VA 23944 Telephone (434) 676-9054

June 17, 2005

Robert E. Feldman Attention: Comments

Federal Deposits Insurance Corporation

550 17th Street, NW Washington, DC 20429

Dear Mr. Feldman:

I would like to express my opposition to the Proposed Classification of Commercial Credit Exposures.

The current FAS 114 review already requires that we calculate loss severity for loans rated below the "Pass" category. Our bank currently utilizes six classifications, Pass, Pass – Acceptable with Care, Special Mention, Substandard, Doubtful, and Loss, in our quarterly review of commercial borrowers. Any relationship graded below "Pass" is subjected to a detailed review whereby a specific reserve is established based on that relationship's projected loss amount.

The current system is effective and already accomplishes what this new method proposes. A change will only introduce more confusion and cost into the process with no measurable benefit to the safety and soundness of the bank.

Sincerely,

Earl C. Currin, Jr.

Director

MEMBER FEDERAL RESERVE SYSTEM